

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

GREGORY STILLMAN,)	
)	
Plaintiff,)	
)	Case No.: 4:19-cv-00222
v.)	
)	
WAL MART STORES EAST I, LP,)	
)	
Defendant.)	

**DEFENDANT’S OBJECTIONS TO TOPICS IDENTIFIED IN PLAINTIFF’S AMENDED
NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE OF DEFENDANT
WAL-MART STORES EAST I, LP**

Defendant Wal-Mart Stores East I, LP (“Walmart”) submits the following Objections to Plaintiff’s Topics Identified in Plaintiff’s Amended Notice of Deposition of Corporate Representative of Defendant Wal-Mart Stores East I, LP. These Objections are based on the reasonable investigation and facts in this matter.

TOPICS FOR EXAMINATION

3. All policies, procedures, and practices in effect on March 8, 2018 regarding the operation and safety of entrances at the Raytown Supercenter, including the Overhead Door.

Objection. Defendant objects to this topic as overly broad and not narrowly tailored to the claims and defenses in this case, in that it requests information that is not relevant to the subject matter of this lawsuit and is not calculated to lead to the discovery of admissible evidence as the irrefutable video evidence in this matter conclusively shows that the Overhead Door did not malfunction or lower unexpectedly.

4. Maintenance, servicing, repairs, or replacements to the Overhead Door from March 8, 2017 through May 8, 2018.

Objection. Defendant objects to this topic as overly broad and not narrowly tailored to the claims and defenses in this case, in that it requests information that is not relevant to the subject matter of this lawsuit and is not calculated to lead to the discovery of admissible

evidence as the irrefutable video evidence in this matter conclusively shows that the Overhead Door did not malfunction or lower unexpectedly.

7. All incidents in which the Overhead Door malfunctioned or lowered unexpectedly from March 8, 2017 through March 8, 2018.

Objection. Defendant objects to this topic as overly broad and not narrowly tailored to the claims and defenses in this case, in that it requests information that is not relevant to the subject matter of this lawsuit and is not calculated to lead to the discovery of admissible evidence as the irrefutable video evidence in this matter conclusively shows that the Overhead Door did not malfunction or lower unexpectedly.

Respectfully submitted,

/s/ M. Jared Marsh

Lindsay P. Windham (MO #66153)

M. Jared Marsh (MO #51817)

HALBROOK WOOD, PC

3500 West 75th Street, Suite 300

Prairie Village, Kansas 66208

TEL: (913) 529-1188

FAX: (913) 529-1199

E-MAIL: lwindham@halbrookwoodlaw.com

E-MAIL: jmarsh@halbrookwoodlaw.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of December 2019, the foregoing was electronically filed with the Clerk of the Court via the Court's electronic filing system, which sends notifications to:

James A. Montee
Amanda J. Blackwood
Jeffrey Blackwood
MONTEE LAW FIRM, P.C.
P.O. Box 127
St. Joseph, Missouri 65054
TEL: (816) 364-1650
FAX: (816) 364-1509
E-MAIL: monteelaw@outlook.com
E-MAIL: amontee@monteelawfirm.com
E-MAIL: jblackwood@monteelawfirm.com
ATTORNEYS FOR PLAINTIFF

/s/ M. Jared Marsh

ATTORNEY FOR DEFENDANT